



HILL WALLACK LLP

ATTORNEYS AT LAW

202 CARNEGIE CENTER, P.O. BOX 5226, PRINCETON, NJ 08543-5226
TELEPHONE: (609) 924-0808, FAX: (609) 452-1888
WWW.HILLWALLACK.COM

Writer's Direct Dial: (609) 734-6328

March 15, 2013

VIA CM/ECF ELECTRONIC FILING

Honorable Ann M. Donio
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
1 John F. Gerry Plaza
4th & Cooper Streets
Camden, NJ 08101

Re: Tsann Kuen (Zhangzhou) Enterprise Co., Ltd. v. Alan J. Sutton, et al.
Civil Action No.: 1:12-cv-4471 (RMB)(AMD)

Dear Judge Donio:

Pursuant to Local Rule 37.1(a)(1), I am writing to request an in-person status conference to address and resolve pervasive deficiencies and evasiveness in defendants' responses to plaintiff's discovery demands. On behalf of plaintiff, I also seek an extension of the remaining discovery deadlines due to defendants' noncompliance and delay in the discovery.

Pursuant to the scheduling order dated February 21, 2013, defendants responded to plaintiff's discovery demands on March 4, 2013. However, defendants objected to almost all of plaintiff's interrogatories and document requests and only produced seven pages of documents.

On March 6, 2013, plaintiff attempted to resolve the dispute in good faith by sending a letter to defendants' counsel addressing the deficiencies in defendants' responses and their groundless objections. Plaintiff's letter cited the Federal Rules of Civil Procedure and other authorities that permit plaintiff to seek information and documents as requested and explained why defendants' objections have no merit. Also, plaintiff's letter set forth the specific deficiencies in defendants' discovery responses. A copy of plaintiff's letter to defendants' counsel dated March 6, 2013 is attached to this letter.

Plaintiff requested that defendants' counsel respond to the letter by March 13, 2013 and indicated that if plaintiff did not hear from defendants' counsel by March 13, 2013, plaintiff would assume that parties have reached an impasse. Defendants have failed to respond to plaintiff's letter.

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Therefore, pursuant to Local Rule 37.1 (a) (1), plaintiff brings this dispute to the Court's attention and requests the Court's intervention to resolve the dispute promptly.

A copy of plaintiff's interrogatories and document requests to defendants, defendants' responses to plaintiff's interrogatories, and defendants' responses to plaintiff's document requests are also attached to this letter for the Court's reference.

Respectfully submitted,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name Kun Zhao.

Kun Zhao

Encls.

cc: Andrew Bronsnick, Esq. (via regular mail w/encls.)